

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE

EMC CORPORATION,	)	
EMC INTERNATIONAL COMPANY and	)	
EMC INFORMATION SYSTEMS	)	
INTERNATIONAL,	)	
	)	
Plaintiffs,	)	
	)	
v.	)	C.A. No. 13-1985 (RGA)
	)	
PURE STORAGE, INC.,	)	
	)	
Defendant.	)	

**STIPULATION AND [PROPOSED] ORDER  
TO SET POST-TRIAL BRIEFING SCHEDULE**

WHEREAS on March 18, 2016, the Court ordered the parties to submit a proposed schedule for any further proceedings anticipated in this case (D.I. 359);

WHEREAS the parties have agreed to the following proposed schedule; and

WHEREAS the parties have agreed to defer briefing on any motions for attorneys' fees until after post-trial motions are decided and any appeal;

IT IS HEREBY STIPULATED by Plaintiffs EMC Corporation, EMC International Company, and EMC Information Systems International (collectively, "EMC") and Defendant Pure Storage, Inc. ("Pure Storage"), subject to the approval of the Court, that the following deadlines shall be set for the parties' anticipated post-trial motions:

- The parties shall file any renewed motions under Fed. R. Civ. P. 50(b) and any motions for a new trial under Fed. R. Civ. P. 59 on or before **April 14, 2016**.  
EMC shall file its motion for a permanent injunction on or before the same date.

- The parties shall file briefs in opposition to any renewed motions under Fed. R. Civ. P. 50(b), any motions for a new trial under Fed. R. Civ. P. 59, and EMC's motion for a permanent injunction on or before **May 10, 2016**.
- The parties shall file reply briefs in support of any motions under Fed. R. Civ. P. 50(b), any motions for a new trial under Fed. R. Civ. P. 59, and EMC's motion for a permanent injunction on or before **May 27, 2016**.
- The parties may file motions to seal certain trial exhibits. The parties are meeting and conferring, will complete that discussion promptly, and will, by **April 5, 2016**, file any such motions with the Court.
- EMC intends, after obtaining a supplemental financial production from Pure, to file a motion for an accounting and a determination of prejudgment interest. The parties are presently conferring regarding the timing of that production. The parties will complete that discussion promptly and will, by **April 1, 2016**, present the Court with a proposed briefing schedule for briefing on this motion.
- The time to file any motion for attorneys' fees is hereby extended as follows: (1) in the event there is no appeal, any motion for fees will be due 30 days after entry of the Court's final judgment, or (2) if there is an appeal, any motion for fees will be due 14 days after entry of a mandate.

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March 28, 2016  
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*Attorneys for Pure Storage, Inc.*

SO ORDERED this \_\_\_\_ day of \_\_\_\_\_, 2016.

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The Honorable Richard G. Andrews